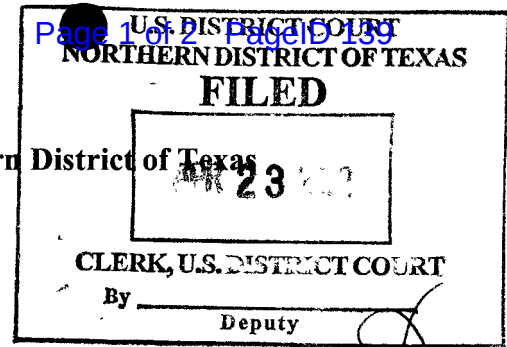


**ORIGINAL**

**In the United States District Court for the Northern District of Texas  
Dallas Division**

**(USA and )  
Jamal Elhaj-Chehade  
Co- plaintiff**

**Vs.**

**Educational Commission for Foreign Medical Graduates  
Et al entities and individuals) Defendants**

**3:01-CV-01301-L**

**Plaintiff's second notice to reaffirm his previous request for notice to produce.**

**Aril 23, 2002**

Comes now this should serve yet as another notice from the plaintiff to the defendants to produce the documents he previously requested.

- 1- copies of the ECFMG income tax filings for the years period 1993-2000
- 2- the ECFMG original copy for exempt status requests for exempt status with the US Authorities both states and Federal.
- 3- Copies of the ECFMG information booklets period 1993-2001
- 4- Copies of ECFMG annual reports for 1993-2002
- 5- Copies of expense made during 1993-2000 as declared in the income tax filing for same period above
- 6- The expenses claimed must state clearly the type of expense, who received the payment and the method of clearance ( example: cancelled checks with name and address and account where those expenses were cashed or cleared and by whom) specially those labeled as examinations refunds and legal expenses
- 7- The plaintiff is demanding copy of the legal expenses for the 1999-2001 period and canceled checks( whom were payable to)
- 8- the name of the case(title of the case , location of the court) and a copy of the original complaint and the defendants responses in which the ECFMG was involved in litigation recently claiming that two doctors cheated on their examinations ( how can two people cheat knowing that the two named doctors took their examinations separately in two far away cities and in two different times, and where the examination questions are different in content and sequence)
- 9- the plaintiff also wants a copy of the case 6-99-1676-24 that the defendants brought against dr Badri and Teknology lane.
- 10- The plaintiff intends to take the oral deposition of Dr Gary the president of ECFMG.
- 11- The plaintiff wants a detailed copy of the ECFMG incomes and revenues for each of the years 1993-2000. the income must show the source
- 12- copies of ECFMG expenditures upon programs and policies that meet the FMGs needs and how much went for each program including those programs in Texas.
- 13- Copy of Lists of programs, locations, and contacts developed by the ECFMG.

**Certificate of Service:** this is to certify that the following parties or individuals have been served with a true copy of the foregoing on April 23, 2002

- 1-The USDC court via Clerk via hand delivery
- 2- the defendants attorney via e-mail as an attachment as not1.doc and via USPS regular mail to MRS Susan Schwartz, Mr Barry Moscovitz at 6688 N Central Expressway # 850, Dallas, Texas 75206-3913
- 3- the ECFMG via e-mail as an attachment not1.doc to [ecfmgics@ecfmg.org](mailto:ecfmgics@ecfmg.org) and via USPS certified mail to ECFMG 3624 Market Street, 4<sup>th</sup> Floor Philadelphia PA 19104-2685
- 3- the plaintiff via hand delivery and USPS
- 4- John Killian at [jckillian@email.com](mailto:jckillian@email.com) ; and hand delivery

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